REMARKS

The Office Action dated June 1, 2007 has been received and carefully noted. The above amendments to the claims, and the following remarks, are submitted as a full and complete response thereto.

Claims 1, 3-5, 8 and 9-15 were been amended to more particularly point out and distinctly claim the subject matter of the invention. Claim 18 has been added. No new matter has been added. Claims 1-18 are submitted for consideration.

Claims 1-17 were rejected under 35 U.S.C. 102(e) as being anticipated by U.S. Patent Application No. 2004/0215957 to Moineau (hereinafter Moineau). The rejection is traversed as being based on a reference that neither teaches nor suggests the novel combination of features clearly recited in claims 1-18.

Claim 1, upon which claims 2-7 depend, recites a distributed routing device including a routing unit configured to route subscriber traffic flow between at least two wireless access networks and an IP network. The device also includes a generating unit configured to generate at least one instance for executing a security function on a subscriber traffic flow, so that physically one security instance for subscribers of at least two wireless access networks is present and logically at least one of the at least two wireless access networks has a respective security instance.

Claim 8, upon which claims 9-15 depend, recites a method for routing subscriber traffic flow in a distributed routing device between at least two wireless access networks and an IP network. The method includes providing at least one instance for executing a

Application No.: 10/646,900

security function on the subscriber traffic flow by logically separating the at least one instance for at least two wireless access networks, so that physically one security instance for subscribers of the at least two wireless access networks is present and logically at least one of the at least two wireless access networks has a respective security instance.

Claim 16 recites a network node in a wireless access network for routing subscriber traffic flow to and from an IP network. The network node includes a connection for connecting a network node to a distributed routing device for routing traffic flow to and from an IP network. The distributed routing device is configured to route subscriber traffic flow between at least two wireless access networks and an IP network. The distributed routing device includes at least one instance for executing a security function on a subscriber traffic flow, so that physically one security instance for subscribers of at least two wireless access networks is present and logically at least one of the at least two wireless access networks has a respective security instance. At least one logical part of the security instance is associated with a context of a respective one of the wireless access networks and includes an interface with the respective wireless access network. The network node includes modifying means for modifying the context in the at least one logical part of the security instance associated with the respective one of the wireless access network via a respectively provided interface.

Claim 17 recites a network system including at least two wireless access networks and a distributed routing device for routing subscriber traffic flow between the at least two wireless access networks and an IP network. The distributed routing device is

configured to route subscriber traffic flow between at least two wireless access networks and an IP network. The distributed routing device includes at least one instance for executing a security function on a subscriber traffic flow, so that physically one security instance for subscribers of at least two wireless access networks is present and logically at least one of the at least two wireless access networks has a respective security instance.

As outlined below, Moineau does not teach or suggest the all of the elements of the pending claims.

Moineau discloses an apparatus for secure communication between at least one user client station via at least one port device and a network. A base unit 26 includes a firewall system 10, a router 12, a VPN server 14, a WLAN port 20 and a LAN port 18. See paragraph 0030. The firewall system 10 controls the traffic coming from an external network as well as the traffic coming from the WLAN port 20 and the traffic coming from the LAN port 18. The firewall system 10 is also connected to the router 12. The firewall system 10 is set-up by the VPN server 14 based on the user profile received from the Radius authentication server 28. See paragraph 0031.

Applicant submits that Moineau does not teach or suggest each of the elements of the pending claims. Each of the pending claims, in part, recites routing subscriber traffic between wireless access networks and an IP network, wherein the wireless access networks correspond to different customer networks. Moineau does not teach or suggest these features.

According to Moineau, a mobile unit 22 can finally communicate with another

user 24 connected to the WLAN access point of another base unit 26 connected to the base unit where the mobile unit 22 is, via the LAN internal port 18. In such a case, an encrypted link is created between the mobile unit 22 and the VPN server 14 via the WLAN port 20, the firewall system 10 and the router 12. The VPN server 14 sets the firewall system 10 according to the particular rule for the user. See paragraph 0041 of Moineau. In addition, Moineau describes roaming of the mobile unit 22 from one WLAN port 20 of a base unit 26 to the other WLAN port 20 of another base unit 26 of the same subnet. See paragraph 0049 of Moineau.

In contrast, the present invention is concerned with routing subscriber traffic between wireless access networks and an IP network, wherein the wireless access networks correspond to different customer networks. The Office Action seems to mix up the WLAN clients 22 and 24 of Moineau with the "at least two wireless access networks".

The base unit 26 of Moineau could be regarded as wireless access network. However, as described in paragraph 0049 of Moineau, in case of roaming from one base unit 26 to another it is assumed that the base units belong to the same subnet. Therefore, Moineau lies completely out of the field of the present invention which deals with the problem that there is no interaction between contexts of different wireless access networks. According to the present invention, each wireless access network can only manage and manipulate the profiles of its subscribers, instances or tables belonging to VPN, routing and ACL list via management consoles. See paragraphs 0043-0046 of the original application. In contrast, Moineau shows only one wireless access network within

which roaming is performed. Therefore, Applicant respectfully asserts that the rejection under 35 U.S.C. §102(e) should be withdrawn because Moineau fails to teach or suggest each feature of claims 1, 8, 16 and 17 and hence, dependent claims 2-7 and 9-15 thereon.

As noted previously, claims 1-18 recite subject matter which is neither disclosed nor suggested in the prior art references cited in the Office Action. It is therefore respectfully requested that all of claims 1-18 be allowed, and this application passed to issue.

If for any reason the Examiner determines that the application is not now in condition for allowance, it is respectfully requested that the Examiner contact, by telephone, the applicant's undersigned attorney at the indicated telephone number to arrange for an interview to expedite the disposition of this application.

In the event this paper is not being timely filed, the applicant respectfully petitions for an appropriate extension of time. Any fees for such an extension together with any additional fees may be charged to Counsel's Deposit Account 50-2222.

Respectfully submitted,

Arlene P. Neal

Registration No. 43,828

Customer No. 32294
SQUIRE, SANDERS & DEMPSEY LLP
14TH Floor
8000 Towers Crescent Drive
Tysons Corner, Virginia 22182-2700
Telephone: 703-720-7800

Fax: 703-720-7802

APN:ksh

Enclosures: Additional Claim Fee Transmittal

Check No. <u>16905</u>